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DATE FILED: 12/20/2019

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DARWIN COLUMNA,

Plaintiff,

—against—

NYC POLICE OFFICER GENER GOMEZ, et  
al.,

Defendants

2019 DEC 17 AM 11:42

RECEIVED  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
BY PROSE OFFICER  
DOC # 12-17-X9  
DATE FILED: 12-17-19  
PLAINTIFF'S REQUEST  
PURSUANT TO FEDERAL RULE  
OF CIVIL PROCEDURE 34

1:19-CV-03801 -PGG-SDA

Pursuant to Rule 34 and of the Federal Rules of Civil Procedure, Defendant shall produce and permit Plaintiff or its representative to inspect, copy, test, or sample the following items in the Defendants' possession, custody, or control within 30 days from the receipt of this request:

1. Any NYPD Complaint Reports related to or concerning the incidents described in the complaint.
2. The memobook entries and/or daily activity reports for: all members of the NYPD who participated in or were present during each of the incidents described in the complaint.
3. Any 911 or 311 reports, including any recordings, related to or concerning the incidents described in the complaint.
  - a. This request includes but is not limited to a request for any relevant telephone Reports.
4. Any radio run reports (audio or written) related to or concerning the incidents described in the complaint.
5. Any recordings, dispatcher logs, transcripts or memoranda recording any police or fire department communications related to the incident alleged in the complaint, this demand includes, but is not limited to any text messages, emails, or other electronic

messages sent by members of the NYPD related to or concerning the incidents described in the complaint.

6. Any written notes made by members of the NYPD concerning the incidents described in the complaint.
7. Any record of statements made by Argenis Baptista or Francis Ramos related to the incidents described in the complaint.
8. Any Stop and Frisk Reports related to or concerning the incidents described in the complaint.
9. Any records relating to statements made or admissions made by Argenis Baptista in connection with his arrest and conviction for drug possession arising out of the vents described in the complaint.
10. Any Aided reports and/or any line-of-duty injury reports, related to or concerning the incidents described in the complaint.
11. Any property vouchers related to or concerning the incidents described in the complaint.
12. Any evidence vouchers related to or concerning the incidents described in the complaint.
13. Any Omniform related to or concerning the incidents described in the complaint.
14. Any mugshots related to or concerning the incidents described in the complaint.
15. Any reports of medical treatment related to or concerning the incidents described in the complaint, including any AIDED reports.
16. Any handwritten OLBS form related to or concerning the incidents described in the complaint.

17. Any CCRB records and/or IAB closing reports related to or concerning the incidents described in the complaint.
18. All records related to Plaintiff's arraignment on April 27, 2016.
19. All documents related to the charges being dismissed against plaintiff on October 19, 2017.
20. For each of the members of the NYPD involved in the incidents described in the complaint, the CCRB and CPI indices of complaints or incidents that are similar to the incident alleged in the complaint or that raise questions about the credibility of each member of the NYPD who was involved in the incidents described in the complaint.
21. For each member of the NYPD named as a defendant, a list identifying all prior Section 1983 lawsuits filed against and served on the defendant.
22. Any video recordings and photographs of any search at the scene of the stop and frisk or at the police station house.
23. Training manuals, videos and written policies and procedures for conducting a "wellness check", a cavity search and fingerprinting.
24. Any records, documents, recordings, or other items of a similar nature that the Defendant has obtained pursuant to any releases signed by the Plaintiff.

Dated: New York, New York  
December 12, 2019

Sincerely,



Darwin Columna, Pro Se Plaintiff

ENDORSEMENT: Pursuant to Federal Rules of Civil Procedure 5(d)(1), document requests and other discovery requests shall not be filed with the Court. The Clerk of Court is directed to terminate gavel ECF No. 31 and mail a copy of this Order to the pro se Plaintiff. SO ORDERED. Dated: 12/20/2019

